

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

K.MIZRA LLC,

Plaintiff,

v.

FORTINET, INC.,

Defendant.

Civil Action No.: 2:21-cv-00249-JRG

**Jury Trial Demanded**

**JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT**

Plaintiff K.Mizra LLC ("K.Mizra") and Defendant Fortinet, Inc. ("Fortinet") (collectively, the "Parties") hereby file this Joint Motion to Stay All Deadlines and Notice of Settlement.

The Parties have reached a settlement in principle to resolve all matters in controversy between them. In accordance with this Court's Standing Order Regarding Proper Notification of Settlement to the Court, the Parties request that the Court stay all deadlines for thirty (30) days so that appropriate dismissal papers may be submitted upon finalization of a written settlement agreement. The Parties anticipate filing a stipulation of dismissal within thirty (30) days.

Dated: January 6, 2023

Respectfully submitted,

By: /s/ Angela J. Bubis

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*Attorneys for Defendant Fortinet, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3) on January 6, 2023.

/s/ Angela J. Bubis  
Angela J. Bubis

*Attorney for Plaintiff K.Mizra LLC*

**CERTIFICATE OF CONFERENCE**

In accordance with Local Rule CV-7(h), counsel for the Parties met and conferred via email on January 4, 2023. The Parties are in agreement and are seeking joint relief.

/s/ Angela J. Bubis  
Angela J. Bubis

*Attorney for Plaintiff K.Mizra LLC*